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6 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

7 EDWARD B. DOUGLAS, an individual

Case No. 2:17-cv-02134-APG-PAL

8 Plaintiff,

**STIPULATION AND
ORDER TO EXTEND TIME TO FILE
REPLY IN SUPPORT OF PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

9 v.

(First Request)

10 DREAMDEALERS USA, LLC d/b/a Exotics
Racing, a Nevada limited liability company,
11 DAVID PERISSET, an individual, and
ROMAIN THIEVIN, an individual,

12 Defendants.

13 Plaintiff, EDWARD B. DOUGLAS ("Plaintiff"), and Defendants, DREAMDEALERS
14 USA, LLC, DAVID PERISSET, and ROMAN THIEVIN (collectively "Defendants"), hereby
15 agree and stipulate to extend the time for Plaintiff to file his reply in support of his motion for
16 summary judgment, ECF No. 32, from the current deadline of January 11, 2019 up to and
17 including January 16, 2019. While the Court previously extended the dispositive-motion cutoff
18 once, ECF No. 30, and the opposition deadline twice, ECF Nos. 34 & 36, this is the first request
19 to extend the time for Plaintiff to file his reply in support of his motion for summary judgment,
20 which motion was filed on November 15, 2018.

21 Good cause exists to grant this stipulation and extend the response deadline from January
22 11, 2019 to January 16, 2019. In particular, Plaintiff's legal counsel is traveling out-of-state for
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1 the funeral of his spouse's grandmother, and the requested extension is sought in good faith and
2 not for purposes of undue delay.

3 DATED: January 11, 2019

DATED: January 11, 2019

4 Respectfully submitted,

Respectfully submitted,

5 CLARK LAW COUNSEL PLLC

LITTLER MENDELSON, P.C.

6 /s/ Dustin L. Clark

/s/ Marcus B. Smith

Dustin L. Clark

Wendy M. Krincek

7 Attorney for Plaintiff

Marcus B. Smith

Attorney for Defendants

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10 IT IS SO ORDERED.

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13 UNITED STATES DISTRICT JUDGE

14 Dated: January 11, 2019.
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